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AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Kimberly Olech Telephone: (313) 965-2323

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America v.

CANDELARIO COVARRUBIA,

Case No.

Case: 2:23-mj-30256 Assigned To: Unassigned Assign. Date: 6/16/2023

CMP USA V COVARRUBIA (LH)

CRIMINAL COMPLAINT

	On or about the date(s) of		06/15/2023	in the county of	Wayne	in the
Eastern	District of	Michigan	, the defend	ant(s) violated:		
Code Section			Offense Description			
21 USC 841 18 USC 924(c).			Possession with Intent to Distribute Controlled Substances Use or carry of a firearm during drug possession and/or drug distrubution			
This crin See attached affida	minal complaint is t	pased on thes	e facts:			
✓ Continued o	n the attached shee	t.	_	Complainant's		
			_	Kimberly Olech, Special Printed name of		
and/or by reliable el		nce		Kin J Al	上	
	ectronic means.	nce	_	Judge's sign	上	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

- I, Kimberly Olech, having been duly sworn, state as follows:
- 1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2018. I am currently assigned to the Detroit field office, assigned to the Violent Gang Task Force (VGTF) and charged with investigating gangs and narcotics trafficking. Prior to my present assignment, I was a police officer for the City of Tucson in Arizona.
- 2. I am submitting this affidavit in support of a criminal complaint alleging that **CANDELARIO COVARRUBIA** has violated Title 21, United States Code Section 841, Drug Trafficking, and Title 18, United States Code Section 924(c), Use of a Firearm During and in Relation to Any Drug Trafficking Crime. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.
- 3. This affidavit is based on my personal knowledge as well as information provided to me by other law enforcement agents and witnesses.
- 4. On June 15, 2023 at approximately 6:00 a.m. a federal search warrant was executed at COVARRUBIA's residence, XXXX Longworth, Detroit, in the

Eastern District of Michigan, by FBI Detroit Violent Gang Task Force. After police knocked and announced, there was no response. Law enforcement then breached the front door. Within seconds of the front door being breached COVARRUBIA's wife appeared at the front door and began arguing with Law Enforcement. His wife attempted to slam the door shut, but Law Enforcement removed his wife from the residence and detained her. Law enforcement provided additional commands, including commands given over a PA of a marked patrol vehicle, for COVARRUBIA to come to the door, there was still no sign of COVARRUBIA. Two children eventually came to the front door and were removed from the residence and, separately, a two-week old newborn was escorted out of the residence by law enforcement. Law Enforcement observed a male matching the physical description of COVARRUBIA appear in the backyard, but the individual quickly disappeared from their sight. It was unknown if the individual went back inside the residence or if he fled over the fence in to the neighbor's yard. At that point the operation turned into a barricaded subject. Additional commands were given by Law Enforcement for COVARRUBIA to come to the front door. There was still no response from COVARRUBIA. After approximately 2.5 hours of calling COVARRUBIA to the front door with no response the FBI SWAT Team made entry into the residence and secured the location. No additional persons were found inside the residence.

- 5. The FBI SWAT Team located COVARUBBIA hiding under the deck in a neighbor's backyard (the neighbor's residence is located immediately adjacent to COVARUBBIA's residence). COVARUBBIA was wearing socks with no shoes. As a result, he sustained a laceration to the bottom of his right foot and was transported to the hospital for medical attention.
- 6. After COVARRUBIA's residence was secure, law enforcement began a search of the residence. During the search, two pistols were located on the floor in the walk-in closet of the master bedroom. On the floor next to the pistols were tax documents and other paperwork with the name Candelario COVARRUBIA on it. Additionally, in the closet were men's clothing and accessories. There was other paperwork in the master bedroom that had COVARRUBIA's name on it well as paperwork that had his wife's name on it. Two pistol magazines were also seized from the master bedroom. Based on my training and experience and the items located in the bedroom it is reasonable to believe that COVARRUBIA and his wife utilized this bedroom daily.
- 7. A chain of several keys were located inside the residence on the stairs. One of the keys were for the Chevrolet Silverado parked in front of the residence that COVARRUBIA was seen driving multiple times during surveillance. There was also a key that unlocked the padlock to the detached garage/shed on the key chain. The garage was constructed into a furnished room/office that had dressers,

shelving, a couch, wall decoration, and a shrine of Jesus Malverde known to me as the patron saint of narcotics traffickers. There was also immigration paperwork on the couch with COVARRUBIA's name on it. During a search of the garage the following items were located and seized: white chunky substance in black plastic bag (total package weight 1060.5 grams, TruNarc Scan containing fentanyl), plastic bag with white powder (total package weight 155.5 grams, TruNarc Scan containing cocaine), plastic ziplock bag with white powdery substance, plastic ziplock containing nine baggies of crystal substance, rectangular vacuum sealed package containing white chunky substance, digital scale, various types of ammunition, notebook ledgers, U.S. currency, plastic ziplock bag containing blue pills, Hatsan Armor Company Escort Slugger shotgun, serial number 70-H21PT-006410, with the name EL Ruso drawn on the side of the gun. The shotgun was hanging on the wall inside the garage. The drugs were hidden in an aluminum trash can inside the garage. Based on my training and experience, I know the quantities of fentanyl and cocaine seized are distribution quantities, rather than for personal use. Based on my training and experience, I also know that drug traffickers possess firearms to protect their drugs and drug proceeds.

8. During the investigation, CHS-1 reported he/she knows
COVARRUBIA by the nickname "Ruso." Additionally, T-Mobile provided
records for the cellular telephone number utilized by COVARRUBIA (as

corroborated by controlled buys from COVARRUBIA arranged using that cellular telephone number and physical surveillance of COVARRUBIA that matched pings of that cellular telephone number) and the subscriber name was listed as "Ruso Rojo." COVARRUBIA also has a tattoo on his right arm of a Grim Reaper holding a scythe. The name "Ruso" is on the blade of the scythe.

9. The pistols that were located during the search were: SCCY CPX-2 Pistol, caliber 9mm, serial number 905130, and a black pistol that was painted covering the serial number and make/model. The SCCY pistol was loaded with eleven rounds of 9mm ammunition and the black pistol was loaded with rounds of .38 ammunition.

10. Based on the facts set forth above, I believe that probable cause exists to conclude that **CANDELARIO COVARRUBIA** knowingly violated Title 21, United States Code Section 841, Drug Trafficking, and Title 18, United States Code Section 924(c), Use of a Firearm During and in Relation to Any Drug Trafficking Crime.

Kimberly Olech Special Agent, FBI

Sworn to before me and signed in my presence and/or by reliable electronic means.

Honorable Kimberly G. Altman United States Magistrate Judge

Dated: June 16, 2023